

1 MARK S. CARLSON (*pro hac vice*)
2 HAGENS BERMAN SOBOL SHAPIRO LLP
3 1301 Second Ave., Ste. 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
markc@hbsslaw.com

5 *Attorneys for Plaintiffs*

KELLY M. KLAUS (State Bar No. 161091)
MUNGER, TOLLES & OLSON LLP
560 Mission Street, Twenty-Seventh Floor
San Francisco, CA 94105-2907
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
kelly.klaus@mto.com

5 *Attorneys for Defendants*

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 REARDEN LLC, et al.,

11 Plaintiffs,

12 v.

13 THE WALT DISNEY COMPANY, et al.,

14 Defendants.

No. 4:17-CV 04006-JST-SK
No. 4:17-CV-04191-JST-SK

**STIPULATION AND [PROPOSED]
ORDER REGARDING MARCH 2,
2020 DISCOVERY CONFERENCE
AND DISCOVERY DEADLINE**

Hon. Sallie Kim

15 REARDEN LLC, et al.,

16 Plaintiffs,

17 v.

18 TWENTIETH CENTURY FOX FILM
CORPORATION, et al.,

19 Defendants.

1 The undersigned parties do hereby stipulate and agree as follows:

2 **WHEREAS**, the monthly discovery conference in these cases is on calendar for March 2,
3 2020, at 9:30 a.m. (Dkt. 218).

4 **WHEREAS**, the Court set a deadline of March 13, 2020, for Plaintiffs to complete
5 depositions in connection with Defendants' pending summary judgment motion (Dkt. 215).

6 **WHEREAS**, Plaintiffs and Defendants have been working cooperatively to schedule such
7 depositions.

8 **WHEREAS**, one of the individuals whose deposition Plaintiffs have requested, Bill Condon,
9 resides in New York, but will be in Los Angeles and available for deposition on March 23, 2020; and
10 the parties have agreed that it would conserve party resources by permitting Mr. Condon's deposition
11 to take place in Los Angeles on March 23, 2020.

12 **WHEREAS**, Plaintiffs also have requested to take the deposition of Vincent Cirelli of Luma
13 Pictures. Defendants' counsel has been working with Luma Picture's counsel to secure an available
14 date for deposition the week of March 16, 2020.

15 **WHEREAS**, other than confirming with the Court that it is permissible for Plaintiffs to
16 proceed with Mr. Condon's deposition on March 23, 2020, and Mr. Cirelli's deposition the week of
17 March 16, 2020, the parties have no discovery issue to present to the Court at this time.

18 **WHEREAS**, the parties believe it would conserve Court and party resources to take the
19 March 2, 2020 discovery conference off calendar, with each side reserving the right to file a two-
20 page letter brief in the event a discovery issue requiring the Court's resolution arises between now
21 and the April 2020 discovery conference.

22 **WHEREAS**, the following extensions of time have been requested either jointly or by one
23 side, and ordered by the Court:

- 24 a. Dkt. No. 90: Order extending time for defendants to answer amended complaint;
25 b. Dkt Nos. 92 and 95: Orders extending time to file CMC statement and hearing
26 date;
27 c. Dkt Nos. 120 and 123: Orders extending time to file letter briefs for MSJ;

- 1 d. Dkt Nos. 133 and 141: Orders extending MSJ Briefing Schedule;
- 2 e. Dkt. Nos. 172 and 174: Orders extending time for letter briefs on discovery
- 3 dispute;
- 4 f. Dkt. No. 202: extending deadline for completing summary judgment depositions
- 5 from January 31 to February 7, 2020;
- 6 g. Dkt. No. 209: extending deadline for completing summary judgment depositions
- 7 from February 7 to February 28, 2020;
- 8 h. Dkt. No. 218: extending deadline for completing summary judgment depositions
- 9 from February 28 to March 13, 2020.

10 **WHEREAS**, the requested extension herein will have no other effect on the case
11 management dates currently in place in these cases.

12 **NOW THEREFORE**, for good cause, the parties stipulate as follows:

13 1. Notwithstanding the March 13, 2020, cut-off for Plaintiffs to take summary judgment
14 depositions, Plaintiffs may take the deposition of Bill Condon on March 23, 2020, and the deposition
15 of Vincent Cirelli the week of March 16, 2020.

16 2. The discovery conference on calendar for March 2, 2020, should be taken off
17 calendar. If either side wishes to raise a discovery issue before the next discovery conference, the
18 party raising the issue shall file and serve a letter brief of up to two pages in length; and the other
19 side will have until the close of the next Court day to file a responsive letter brief of up to two pages
20 in length.

21 3. If convenient for the Court, the next discovery conference should be scheduled for
22 Monday, April 6, 2020, at 10:30 a.m. If after meeting and conferring the parties have any dispute(s)
23 to present to the Court at that conference, each side may submit a letter brief of up to five pages in
24 length by 5 p.m. on March 26, 2020.

1 DATED: February 27, 2020.

HAGENS BERMAN SOBOL SHAPIRO LLP

2 By /s/ Mark S. Carlson¹
3 Mark S. Carlson
4 *Attorneys for Plaintiffs*

5 MUNGER, TOLLES & OLSON LLP

6 By /s/ Kelly M. Klaus
7 Kelly M. Klaus
8 *Attorneys for Defendants*

27 _____
28 ¹ Signed electronically by Kelly M. Klaus with the concurrence of Mark S. Carlson, pursuant to
L.R. 5-1(i)(3).

1 Pursuant to the foregoing stipulation, **IT IS SO ORDERED.**
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4 DATED: _____, 2020

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6 The Honorable Sallie Kim
7 United States Magistrate Judge
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